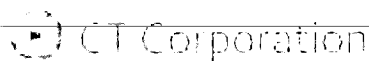


# **EXHIBIT A**



**Service of Process  
Transmittal**

10/22/2013

CT Log Number 523742332

**TO:** Pepsop Intakeparalegal  
PepsiCo, Inc.  
700 Anderson Hill Rd.  
Purchase, NY 10577

**RE:** Process Served in Georgia

**FOR:** Pepsico, Inc. (Domestic State: NC)

**RECEIVED**

*By PepsiCo, Inc. at 2:01 pm, Oct 24, 2013*

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Charles Scott Robider, on behalf of himself and those similarly situated, Pltf. vs. Pepsico, Inc. and Bottling Group, LLC, Dfts.

**DOCUMENT(S) SERVED:** Entry, Summons, Complaint, Consent(s)

**COURT/AGENCY:** Fulton County Superior Court, Fulton, GA  
Case # 2013CV2379105

**NATURE OF ACTION:** Employee Litigation - Unpaid wages

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Atlanta, GA

**DATE AND HOUR OF SERVICE:** By Process Server on 10/22/2013 at 11:30

**JURISDICTION SERVED :** Georgia

**APPEARANCE OR ANSWER DUE:** Within 30 days after service, exclusive of the day of service

**ATTORNEY(S) / SENDER(S):** David E. Tuszynski  
Garland, Samuel & Loeb, P.C.  
3151 Maple Drive  
N.E.  
Atlanta, GA 30305  
404-262-2225

**ACTION ITEMS:** CT has retained the current log, Retain Date: 10/23/2013, Expected Purge Date: 10/28/2013  
Image SOP  
Email Notification, Pepsop Intakeparalegal PEPsOPintakeparalegal@pepsico.com  
Email Notification, Erika Greenberg Erika.greenberg@pepsico.com

**SIGNED:** C T Corporation System  
**PER:** Tyeasha Harris  
**ADDRESS:** 1201 Peachtree Street, N.E.  
Suite 1240  
Atlanta, GA 30361  
**TELEPHONE:** 404-965-3840

Civil Action No. 2013CV237910.5  
Date Filed 10/18/13

Magistrate Court ☐  
Superior Court ☒  
State Court ☐  
Georgia, ~~Gwinnett County~~ Fulton County  
Charles Scott Robider

Attorney's Address

David E. Tuszyński, Esq.  
Garland, Samuel and Loeb, P.C.  
3151 Maple Dr, N.E, Atlanta, GA 30305

Plaintiff

VS.

Pepsico, Inc.;  
Bottling Group, LLC.

Defendant

Name and Address of party to be served.

Pepsico, Inc.  
c/o: CT Corporation System (Reg. Agent)  
1201 Peachtree St, N.E.  
Atlanta, Fulton County, GA 30361

Garnishee

Sheriff's Entry Of Service

Personal ☐

I have this day served the defendant \_\_\_\_\_ personally with a copy of the within action and summons.

Notorious ☐

I have this day served the defendant \_\_\_\_\_ by leaving a copy of the action and summons at his most notorious place of abode in this County.  
Delivered same into hands of 7/1/13 described as follows  
age, about \_\_\_\_\_ years; weight, about \_\_\_\_\_ pounds; height, about \_\_\_\_\_ feet and \_\_\_\_\_ inches; domiciled at the residence of defendant.

Corporation ☒

Served the defendant Pepsico, Inc a corporation  
by leaving a copy of the within action and summons with CT Corporation  
in charge of the office and place of doing business of said Corporation in this County.

Tack & Mail ☐

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

Non Est ☐

Diligent search made and defendant \_\_\_\_\_ not to be found in the jurisdiction of this Court.

This 22 day of Oct, 2013

[Signature]  
Deputy

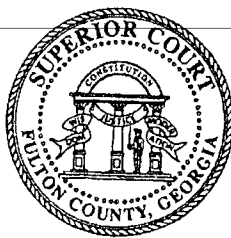
Sheriff Docket \_\_\_\_\_ Page \_\_\_\_\_

Fulton ~~Gwinnett~~ County, Georgia

WHITE: Clerk

CANARY: Plaintiff / Attorney

PINK: Defendant



## IN THE SUPERIOR COURT OF FULTON COUNTY, GEORGIA

136 PRYOR STREET, ROOM C-103, ATLANTA, GEORGIA 30303

## SUMMONS

Charles Scott Robider, on behalf of himself

and those similarly situated

Plaintiff,

vs.

Pepsico, Inc.

Bottling Group, LLC

Defendant

Case No.:

2013 CV 237910.5

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file with the Clerk of said Court and serve upon plaintiff's attorney, whose name and address is:

David E. Tuszynski  
Garland, Samuel & Loeb, P.C.  
3151 Maple Dr., N.E.  
Atlanta, GA 30305

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. **IF YOU FAIL TO DO SO, JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.**

This 18 day of OCT., 2013

Honorable Cathelene "Tina" Robinson  
Clerk of Superior Court

By

Deputy Clerk

To defendant upon whom this petition is served:

This copy of complaint and summons was served upon you

02 Oct, 2013

Deputy Sherriff

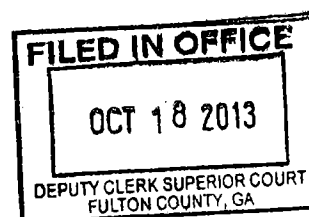
IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

CHARLES SCOTT ROBIDER, on behalf of himself :  
and those similarly situated, :  
Plaintiff :

vs. :

PEPSICO, INC.; :  
BOTTLING GROUP, LLC :  
Defendants :

2013 CV 237910.5  
Civil Action File Number



**COLLECTIVE ACTION CIVIL COMPLAINT**

Charles Scott Robider ("Named Plaintiff"), on behalf of himself and those similarly situated (hereinafter referred to as "Plaintiffs"), hereby complains as follows against Pepsico, Inc. and Bottling Group, LLC ("Defendants").

**INTRODUCTION**

1. Named Plaintiff, Charles Scott Robider, has initiated the instant action to redress violations by Defendant of the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 201, et seq. Named Plaintiff asserts that Defendants failed to pay Named Plaintiff and Plaintiffs proper minimum wage and overtime compensation in violation of the FLSA.

**JURISDICTION AND VENUE**

2. The foregoing paragraphs are incorporated herein as if set forth in their entirety.
3. Defendant Pepsico, Inc. is a foreign corporation registered to do business in the State of Georgia with an office and transacting business in Fulton County, Georgia.
4. Defendant Pepsico, Inc. may be served by service upon its registered agent at its registered office: CT Corporation System, 1201 Peachtree Street, N.E., Atlanta, Fulton County, Georgia 30361.

5. Defendant Pepsico, Inc. is subject to the jurisdiction of this Court.

6. Defendant Bottling Group, LLC is a foreign limited liability company registered to do business in the State of Georgia with an office and transacting business in Fulton County, Georgia.

7. Defendant Bottling Group, LLC may be served by service upon its registered agent at its registered office: Corporation Process Company, 2180 Satellite Boulevard, Suite 400, Duluth, Gwinnett County, Georgia.

8. Defendant Bottling Group, LLC is subject to the jurisdiction of this Court.

9. Venue is proper in this Court.

#### PARTIES

10. The foregoing paragraphs are incorporated herein as if set forth in full.

11. Named Plaintiff Charles Scott Robider is a resident of the State of Georgia.

12. Defendant Bottling Group, LLC is a wholly owned subsidiary of Defendant Pepsico, Inc.

13. Upon information and belief, because of their interrelation of operations, common management, centralized control of labor relations, common ownership, common financial controls, and other factors, Defendants Pepsico, Inc. and Bottling Group, LLC are sufficiently interrelated and integrated in their activities, labor relations, ownership, and management that they may be treated as a single employer for purposes of the instant action.

14. At all times relevant herein, Defendants acted by and through their agents, servants, and employees, each of whom acted at all times relevant herein within the course and scope of their employment or agency with, and for, Defendants.

FLSA COLLECTIVE ACTION ALLEGATIONS

15. Named Plaintiff brings this action for violations of the FLSA as a collective action pursuant to Section 16(b) of the FLSA, 29 U.S.C. § 216(b), on behalf of all persons presently and formerly employed by Defendants in non-exempt positions subject to Defendants' unlawful pay practices and policies described herein and who worked for Defendants at any point in the three years preceding the date the instant action was filed (the members of this putative class are referred to as "Plaintiffs").

16. Named Plaintiff and Plaintiffs worked, or work, at different facilities of Defendants but are subjected to the same unlawful wage policies and practices described herein.

17. Named Plaintiff and Plaintiffs are similarly situated, have (or had) substantially similar non-managerial job duties, have (or had) substantially similar pay provisions, and are (or were) all subject to Defendants' unlawful policies and practices as described herein.

18. There are numerous similarly situated current and former employees of Defendants who were compensated improperly for work and overtime work in violation of the FLSA and who would benefit from the issuance of a Court Supervised Notice of the instant lawsuit and the opportunity to join in the present lawsuit.

19. Similarly situated employees are known to Defendants, are readily identifiable by Defendants, and can be located through Defendants' records.

20. Therefore, Named Plaintiff should be permitted to bring this action as a collective action for and on behalf of himself and those employees similarly situated, pursuant to the "opt-in" provisions of the FLSA, 29 U.S.C. § 216(b).

FACTUAL BACKGROUND

21. The foregoing paragraphs are incorporated herein as if set forth in full.

22. Named Plaintiff worked for Defendants at their location in Savannah, Georgia beginning on or about October 20, 2010.

23. Named Plaintiff and Plaintiffs are current and/or former employees of Defendants, who within the last three years have been or are presently employed by Defendants.

24. Upon information and belief, Defendants have maintained an unlawful wage payment system for at least the last three years, and has enforced such unlawful policies throughout the United States.

NONPAYMENT FOR WORK PERFORMED

25. The foregoing paragraphs are incorporated herein as if set forth in their entirety.

26. Defendants hired Named Plaintiff and Plaintiffs for non-exempt positions with Defendants and required Named Plaintiff and Plaintiffs to perform work for which Plaintiff and Named Plaintiff were not paid to include, but not limited to, the following: completing Defendant's forms and other documents, reviewing Defendants' material, and attending "orientation" (usually at a great distance from Named Plaintiff's and Plaintiffs' regular workplaces).

27. The Defendants' failure to pay the Named Plaintiff and Plaintiffs for these tasks violated the overtime requirements of the FLSA for each workweek in which the time spent performing this work - when considered with the time spent by Named Plaintiff and Plaintiffs performing other work for Defendants - exceeded a total of 40 hours per work week.

28. Defendants' failure to pay the Named Plaintiff and Plaintiffs for these tasks violated the minimum wage requirements of the FLSA for each week the Named Plaintiff and Plaintiffs failed to receive a the minimum wage required by the FLSA.



UNPAID "BREAKS"

29. The foregoing paragraphs are incorporated herein as if set forth in their entirety.

30. Defendants automatically deducted 30 minutes of paid time as an "unpaid lunch break" from Named Plaintiff's and Plaintiffs' paychecks for each shift Named Plaintiff and Plaintiffs worked.

31. Additionally, Defendants did not pay for breaks and rest periods required by law or regulation.

32. The Named Plaintiff and Plaintiffs were not paid for the time when Named Plaintiff or Plaintiffs performed work for the Defendants during the 30 minute period, and/or were not paid for breaks and rest periods required by law or regulation.

33. This unpaid time resulted in Named Plaintiff and Plaintiffs being denied proper overtime compensation by Defendants.

COUNT I

Fair Labor Standards Act ("FLSA")

34. The foregoing paragraphs are incorporated herein as if set forth in their entirety.

35. At all times relevant herein, Defendants have and continue to be "employers" within the meaning of the FLSA.

36. At all times relevant herein, Defendants were and are responsible for paying wages to Named Plaintiff and Plaintiffs.

37. At all times relevant herein, Named Plaintiff and Plaintiffs were and are employed with Defendants as "employees" within the meaning of the FLSA.

38. Under the FLSA, an employer must pay an employee a minimum wage as provided by the FLSA.

39. Under the FLSA, an employer must pay an employee at least one and one half

times his or her regular rate of pay for each hour worked in excess of forty hours per workweek.

40. Defendants' violations of the FLSA include, but are not limited to: (1) unlawfully failing to pay Named Plaintiff and Plaintiffs pay a minimum wage and/or overtime compensation for hours worked during a workweek as required by the FLSA; and, (2) unlawfully failing to pay Named Plaintiffs or Plaintiffs overtime compensation when Defendants automatically deducted 30 minutes of paid time as an "unpaid lunch period" at those times Named Plaintiffs or Plaintiffs worked during said 30 minute period, and/or unlawfully failing to pay for breaks and rest periods required by law or regulation.

41. Defendants' conduct in failing to pay Named Plaintiff and Plaintiffs properly was and is willful, was and is not reasonable, was and is not in good faith.

42. As a result of Defendants' unlawful conduct, Named Plaintiff and Plaintiffs are entitled to recovery from the Defendants of unpaid wages and an equal amount as liquidated damages.

43. Named Plaintiff and Plaintiffs are entitled to recovery of reasonable attorneys' fees, costs and expenses from the Defendants

WHEREFORE, Named Plaintiff and Plaintiffs pray for the following relief:

- (a) Process issue and service of process be made;
- (b) Defendants are to be prohibited from continuing to maintain their illegal policy, practice, or customs in violation of federal wage and hour laws;
- (c) Defendants are to compensate, reimburse, and make Named Plaintiff and Plaintiffs whole for any and all pay and benefits they would have received had it not been for Defendants' illegal actions, including but not limited to past lost earnings;
- (d) Named Plaintiff and Plaintiffs are to be awarded, pursuant to the FLSA, liquidated

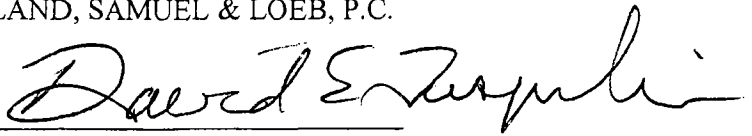
damages in an amount equal to the actual damages in this case;

(e) Named Plaintiff and Plaintiffs are to be awarded the costs and expenses of this action and attorneys fees as provided by applicable law;

(f) Named Plaintiff and Plaintiffs are to be awarded all other relief this Court deems just and proper.

GARLAND, SAMUEL & LOEB, P.C.

BY:



DAVID E. TUSZYNSKI

Georgia Bar No. 720287

ATTORNEY FOR PLAINTIFF

3151 Maple Drive, N.E.  
Atlanta, Georgia 30305  
Ph (404) 262-2225  
Fax: (404) 365-5041

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

CHARLES SCOTT ROBIDER, on behalf of himself :  
and those similarly situated, :  
Plaintiff :

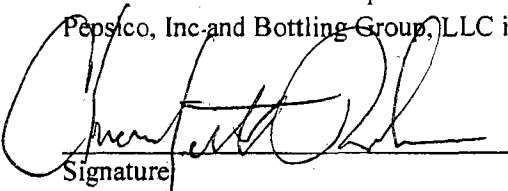
Civil Action File Number

vs. :

PEPSICO, INC.; :  
BOTTLING GROUP, LLC :  
Defendants :

**CONSENT TO JOIN IN LAWSUIT**

I, CHARLES SCOTT ROBIDER [print name], am a current or former employee of Pepsico, Inc and its subsidiary Bottling Group, LLC, and I believe I am entitled to additional wages for unpaid or underpaid hours I worked during the past three years. I consent to join as a party plaintiff in the above captioned lawsuit asserting claims under the Fair Labor Standards Act, 29 U.S.C. §201 et seq, against Pepsico, Inc. and Bottling Group, LLC. I choose to be represented in this matter by the named plaintiff and counsel, Garland Samuel & Loeb, P.C. I understand that the named plaintiff and counsel are seeking recovery of attorneys fees from Pepsico, Inc and Bottling Group, LLC in this matter.

  
Signature

10/16/13  
Date

CHARLES SCOTT ROBIDER  
Name (Please Print)

133 N. ROBERS ST  
Street Address

SAME  
Mailing Address (if different from Street Address)

POOLE GA 31322  
City, State, Zip Code

SAME  
City, State, Zip Code

912-220-1530  
Phone Number

Email Address

**RETURN BY:** **FAX to:** 404-365-5041 or

**EMAIL to:** det@gsllaw.com

**MAIL to:** Pepsico / Bottling Group Collective Action  
c/o Garland, Samuel & Loeb, P.C.  
Attn: David E. Tuszynski, Esq.  
3151 Maple Dr., N.E.  
Atlanta, GA 30305

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

CHARLES SCOTT ROBIDER, on behalf of himself :  
and those similarly situated, :  
Plaintiff :

Civil Action File Number

vs. :

PEPSICO, INC.; :  
BOTTLING GROUP, LLC :  
Defendants :

**CONSENT TO JOIN IN LAWSUIT**

I, Frankie Addison [print name], am a current or former employee of Pepsico, Inc and its subsidiary Bottling Group, LLC, and I believe I am entitled to additional wages for unpaid or underpaid hours I worked during the past three years. I consent to join as a party plaintiff in the above captioned lawsuit asserting claims under the Fair Labor Standards Act, 29 U.S.C. §201 et seq, against Pepsico, Inc. and Bottling Group, LLC. I choose to be represented in this matter by the named plaintiff and counsel, Garland Samuel & Loeb, P.C. I understand that the named plaintiff and counsel are seeking recovery of attorneys fees from Pepsico, Inc. and Bottling Group, LLC in this matter.

Signature

Date

Name (Please Print)

Street Address

Mailing Address (if different from Street Address)

City, State, Zip Code

City, State, Zip Code

Phone Number

Email Address

**RETURN BY: FAX to: 404-365-5041 or**

**EMAIL to: [det@gsllaw.com](mailto:det@gsllaw.com)**

**MAIL to: Pepsico / Bottling Group Collective Action  
c/o Garland, Samuel & Loeb, P.C.  
Attn: David E. Tuszynski, Esq.  
3151 Maple Dr., N.E.  
Atlanta, GA 30305**

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

CHARLES SCOTT ROBIDER, on behalf of himself :  
and those similarly situated, :  
Plaintiff :

Civil Action File Number

vs. :

PEPSICO, INC.; :  
BOTTLING GROUP, LLC :  
Defendants :

**CONSENT TO JOIN IN LAWSUIT**

I, Ricky Jackson [print name], am a current or former employee of Pepsico, Inc and its subsidiary Bottling Group, LLC, and I believe I am entitled to additional wages for unpaid or underpaid hours I worked during the past three years. I consent to join as a party plaintiff in the above captioned lawsuit asserting claims under the Fair Labor Standards Act, 29 U.S.C. §201 et seq, against Pepsico, Inc. and Bottling Group, LLC. I choose to be represented in this matter by the named plaintiff and counsel, Garland Samuel & Loeb, P.C. I understand that the named plaintiff and counsel are seeking recovery of attorneys fees from Pepsico, Inc-and Bottling Group, LLC in this matter.

Signature

Date

Name (Please Print)

Street Address

Mailing Address (if different from Street Address)

City, State, Zip Code

City, State, Zip Code

Phone Number

Email Address

**RETURN BY: FAX to: 404-365-5041 or**

**EMAIL to: [det@gsllaw.com](mailto:det@gsllaw.com)**

**MAIL to: Pepsico / Bottling Group Collective Action  
c/o Garland, Samuel & Loeb, P.C.  
Attn: David E. Tuszynski, Esq.  
3151 Maple Dr., N.E.  
Atlanta, GA 30305**

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

CHARLES SCOTT ROBIDER, on behalf of himself :  
and those similarly situated, :  
Plaintiff :

Civil Action File Number

vs. :

PEPSICO, INC.; :  
BOTTLING GROUP, LLC :  
Defendants :

**CONSENT TO JOIN IN LAWSUIT**

I, Jerry Lynch [print name], am a current or former employee of  
Pepsico, Inc and its subsidiary Bottling Group, LLC, and I believe I am entitled to additional  
wages for unpaid or underpaid hours I worked during the past three years. I consent to join as a  
party plaintiff in the above captioned lawsuit asserting claims under the Fair Labor Standards  
Act, 29 U.S.C. §201 et seq, against Pepsico, Inc. and Bottling Group, LLC. I choose to be  
represented in this matter by the named plaintiff and counsel, Garland Samuel & Loeb, P.C. I  
understand that the named plaintiff and counsel are seeking recovery of attorneys fees from  
Pepsico, Inc. and Bottling Group, LLC in this matter.

Signature

Date

Name (Please Print)

Street Address

City, State, Zip Code

Phone Number

Mailing Address (if different from Street Address)

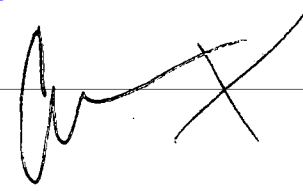
City, State, Zip Code

Email Address

**RETURN BY: FAX to: 404-365-5041 or**

**EMAIL to: det@gslaw.com**

**MAIL to: Pepsico / Bottling Group Collective Action**  
c/o Garland, Samuel & Loeb, P.C.  
Attn: David E. Tuszynski, Esq.  
3151 Maple Dr., N.E.  
Atlanta, GA 30305



IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

CHARLES SCOTT ROBIDER, on behalf of himself :  
and those similarly situated, :  
Plaintiff :

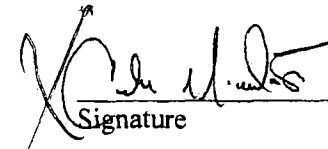
Civil Action File Number

vs. :

PEPSICO, INC.; :  
BOTTLING GROUP, LLC :  
Defendants :

**CONSENT TO JOIN IN LAWSUIT**

I, CARLOS MICHAEL JR [print name], am a current or former employee of  
Pepsico, Inc and its subsidiary Bottling Group, LLC, and I believe I am entitled to additional  
wages for unpaid or underpaid hours I worked during the past three years. I consent to join as a  
party plaintiff in the above captioned lawsuit asserting claims under the Fair Labor Standards  
Act, 29 U.S.C. §201 et seq, against Pepsico, Inc. and Bottling Group, LLC. I choose to be  
represented in this matter by the named plaintiff and counsel, Garland Samuel & Loeb, P.C. I  
understand that the named plaintiff and counsel are seeking recovery of attorneys fees from  
Pepsico, Inc. and Bottling Group, LLC in this matter.

  
Signature

17 OCT 2013  
Date

CARLOS MICHAEL JR  
Name (Please Print)

145 W. Tishany Lane  
Street Address

\_\_\_\_\_  
Mailing Address (if different from Street Address)

Doraville, GA 30132  
City, State, Zip Code

\_\_\_\_\_  
City, State, Zip Code

912. 484. 3418  
Phone Number

carlosmichael40@yahoo.com  
Email Address

**RETURN BY:** **FAX to:** 404-365-5041 or

**EMAIL to:** det@gslaw.com

**MAIL to:** Pepsico / Bottling Group Collective Action  
c/o Garland, Samuel & Loeb, P.C.  
Attn: David E. Tuszyński, Esq.  
3151 Maple Dr., N.E.  
Atlanta, GA 30305



IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

CHARLES SCOTT ROBIDER, on behalf of himself :  
and those similarly situated,  
Plaintiff

Civil Action File Number

vs.

PEPSICO, INC.;  
BOTTLING GROUP, LLC  
Defendants

**CONSENT TO JOIN IN LAWSUIT**

I, Gravin Miller [print name], am a current or former employee of  
Pepsico, Inc and its subsidiary Bottling Group, LLC, and I believe I am entitled to additional  
wages for unpaid or underpaid hours I worked during the past three years. I consent to join as a  
party plaintiff in the above captioned lawsuit asserting claims under the Fair Labor Standards  
Act, 29 U.S.C. §201 et seq, against Pepsico, Inc. and Bottling Group, LLC. I choose to be  
represented in this matter by the named plaintiff and counsel, Garland Samuel & Loeb, P.C. I  
understand that the named plaintiff and counsel are seeking recovery of attorneys fees from  
Pepsico, Inc. and Bottling Group, LLC in this matter.

Gravin Miller  
Signature

10/17/13  
Date

Gravin Miller  
Name (Please Print)

1741 Toni Branch Rd  
Street Address

Mailing Address (if different from Street Address)

Ellabell GA 31308  
City, State, Zip Code

City, State, Zip Code

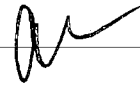
(864) 320-5495  
Phone Number

STSblue02@comcast.net  
Email Address

**RETURN BY:** **FAX to:** 404-365-5041 or

**EMAIL to:** det@gslaw.com

**MAIL to:** Pepsico / Bottling Group Collective Action  
c/o Garland, Samuel & Loeb, P.C.  
Attn: David E. Tuszynski, Esq.  
3151 Maple Dr., N.E.  
Atlanta, GA 30305



IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

CHARLES SCOTT ROBIDER, on behalf of himself :  
and those similarly situated, :  
Plaintiff :

Civil Action File Number

vs. :

PEPSICO, INC.; :  
BOTTLING GROUP, LLC :  
Defendants :

CONSENT TO JOIN IN LAWSUIT

I, Nigel Washington [print name], am a current or former employee of  
Pepsico, Inc and its subsidiary Bottling Group, LLC, and I believe I am entitled to additional  
wages for unpaid or underpaid hours I worked during the past three years. I consent to join as a  
party plaintiff in the above captioned lawsuit asserting claims under the Fair Labor Standards  
Act, 29 U.S.C. §201 et seq, against Pepsico, Inc. and Bottling Group, LLC. I choose to be  
represented in this matter by the named plaintiff and counsel, Garland Samuel & Loeb, P.C. I  
understand that the named plaintiff and counsel are seeking recovery of attorneys fees from  
Pepsico, Inc and Bottling Group, LLC in this matter.

Nigel Washington  
Signature

10-16-13  
Date

Nigel Washington  
Name (Please Print)

50 Dacetta Drive  
Street Address

Mailing Address (if different from Street Address)

Savannah, GA, 31419  
City, State, Zip Code

City, State, Zip Code

912-508-8943  
Phone Number

Email Address

**RETURN BY: FAX to: 404-365-5041 or**

**EMAIL to: det@gslaw.com**

**MAIL to: Pepsico / Bottling Group Collective Action**  
c/o Garland, Samuel & Loeb, P.C.  
Attn: David E. Tuszynski, Esq.  
3151 Maple Dr., N.E.  
Atlanta, GA 30305